

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE AFTRA
RETIREMENT FUND, in its capacity as a
fiduciary of the AFTRA Retirement Fund,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-00686 (SAS) (DF)

BOARD OF TRUSTEES OF THE IMPERIAL
COUNTY EMPLOYEES' RETIREMENT
SYSTEM, in its capacity as a fiduciary of the
Imperial County Employees' Retirement System,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-03020 (SAS) (DF)

THE INVESTMENT COMMITTEE OF THE
MANHATTAN AND BRONX SURFACE
TRANSIT OPERATING AUTHORITY
PENSION PLAN, in its capacity as a fiduciary
of the MaBSTOA Pension Plan, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-04408 (SAS) (DF)

DECLARATION OF SAMUEL E. BONDEROFF

SAMUEL E. BONDEROFF declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for defendant JPMorgan Chase Bank, N.A. in this action. I respectfully submit this declaration on behalf of defendant in support of its Memorandum of Law in opposition to plaintiffs' motion to exclude expert testimony of Patricia Chadwick and Michael Koehn.

2. The purpose of this declaration is to submit and identify for the Court true and correct copies of the following testimony and documents referenced in defendant's opposition papers.

3. Attached as Exhibit A is a true and correct copy of excerpts of the deposition transcript of Patricia Chadwick dated December 10, 2010.

4. Attached as Exhibit B is a true and correct copy of excerpts of the deposition transcript of Michael F. Koehn dated December 16, 2010.

5. Attached as Exhibit C is a true and correct copy of excerpts of the Declaration of Michael F. Koehn, Ph.D. dated May 19, 2010.


6. Attached as Exhibit D is a true and correct copy of excerpts of the deposition transcript of Bernard Black dated December 3, 2010.

7. Attached as Exhibit E is a true and correct copy of excerpts of the deposition transcript of Lisa Shin dated June 25, 2010.

8. Attached as Exhibit F is a true and correct copy of excerpts of the deposition transcript of Matthew Sarson dated April 21, 2010.

9. Attached as Exhibit G is a true and correct copy of the parties' Stipulation Regarding Discovery of Certain Types of Expert Witness Information dated March 22, 2010.

Dated: New York, New York
October 11, 2011



SAMUEL E. BONDEROFF